

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
AUSTIN X. JONES :
Debtor : CHAPTER 13
:
JACK N. ZAHAROPOULOS :
STANDING CHAPTER 13 TRUSTEE :
Movant : CASE NO. 5-25-bk-00022
:
AUSTIN X. JONES :
Respondent :
:

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 10th day of February 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Schedule I and Statement of Financial Affairs #27 lack description for stagehand self-employment.
2. Trustee avers that Debtor(s)' Plan cannot be administered due to the lack of the following:
 - a. Debtor(s) has not provided to Trustee a six (6) month Profit and Loss Statement for August 2024 through January 2025 (month by month).

WHEREFORE, Trustee alleges and avers that Debtor(s)' Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- b. Deny confirmation of Debtor(s)' Plan.
- c. Dismiss or convert Debtor(s)' case.
- d. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 10th day of February 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

CIBIK LAW, PC
1500 WALNUT STREET, SUITE 900
PHILADELPHIA, PA 19102-

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee